

### **Remarks**

In view of the amendments above and the following remarks, Applicants respectfully request reconsideration of the rejections and that the case pass to issue.

Applicants have amended independent claims 1, 11, and 15 to more particularly point out and distinctly claim the invention as including a plurality of "removable" control portions, wherein each respective portion corresponds to a certain "hybrid electric vehicle drive system" functionality. Applicants respectfully assert that none of the references cited by the Examiner teach this limitation.

### **Objection To The Abstract**

Applicants respectfully assert that the amendment to the Abstract obviates this rejection. In particular, the Abstract has been amended to reflect the method claim as requested by the Examiner.

### **35 U.S.C. § 102(e) Rejection Of Claims 1-10 Over Raffari**

Independent claim 1 is the only independent claim which relates to this rejection. Independent claim 1 has been amended to more particularly point out and distinctly claim "said controller comprising a plurality of removable control portions, wherein each of said plurality of portions corresponds to a certain hybrid vehicle drive system functionality." The Examiner, at page 6 of the Office Action mailed on April 29, 2003, notes that *Raffari* "fails to specifically disclose that said portions are removable." As such, *Raffari* fails to particularly teach each element now recited in independent claim 1. In addition, dependent claims 2-10, which depend from independent claim 1, are patentable for at least the same reasons that claim 1 is patentable.

any direct control of the drive system. As such, *Beckert* fails to provide any suggestion, motivation, or incentive to teach a plurality of "removable" control portions, wherein each respective portion corresponds to a certain "hybrid electric vehicle drive system" functionality, as recited in independent claims 1, 11, and 15. Because *Raffari* fails to make up for this deficiency, independent claims 1, 11, and 15, as well as the dependent claims which depend therefrom, are non-obvious and patentable over the combination of *Raffari* and *Beckert*.

**Conclusion**

In view of the above amendments and remarks, Applicants respectfully request reconsideration of the rejections and that the case pass to issue.

Please charge any additional fees or credit any overpayments as a result of the filing of this paper to our Deposit Account No. 06-1510 -- a duplicate of this paper is enclosed for that purpose.

Respectfully submitted,

**DEEPA RAMASWAMY**

By 

John R. Buser  
Reg. No. 51,517  
Attorney for Applicants

Date: 8/22/2003  
**BROOKS KUSHMAN P.C.**  
1000 Town Center, 22nd Floor  
Southfield, MI 48075-1238  
Phone: 248-358-4400  
Fax: 248-358-3351